

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

Joaquin Nevarez,)
Plaintiff,)
v.) Case No.: 1:23-cv-05248
DynaCom Management, LLC.,) Honorable Jeremy C. Daniel
Ali Setork and Mina Setork, Individually)
Defendants.)

**DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED
COMPLAINT IN ITS ENTIRETY**

NOW COME Defendants **DYNACOM MANAGEMENT, LLC; ALI SETORK**; and **MINA SETORK**, by and through their attorneys, Koehler Dinkel LLC, and pursuant to Federal Rules of Civil Procedure 12(b)(7), and in addition, 12(b)(1), 12(b)(6), and 12(f), hereby move this Court for an Order dismissing Plaintiff's First Amended Complaint in its entirety.

Defendants submit a Memorandum of Law in Support of their Motion to Dismiss, filed simultaneously herewith.

Dated: November 30, 2023

Respectfully Submitted,

**DYNACOM MANAGEMENT, LLC; ALI SETORK;
AND MINA SETORK**

By: s/ Stephanie M. Dinkel
Stephanie M. Dinkel, Esq.
KOEHLER DINKEL LLC
900 S. Frontage Rd., Suite 300
Woodridge, Illinois 60517
Telephone: (630) 505-9939

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 30, 2023, she electronically filed the foregoing **DEFENDANTS' MOTION TO DISMISS PLAINTIFF'S FIRST AMENDED COMPLAINT IN ITS ENTIRETY** with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the following counsel of record:

John Craig Ireland
The Law Firm of John C. Ireland
636 Spruce Street
South Elgin, IL 60177
Email: atty4employees@aol.com

/s/ Stephanie M. Dinkel
Stephanie M. Dinkel, Esq.